## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

	)	
Harriet Menezes	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
United Airlines, Inc., and Frank Colosi,	)	
individually and as Labor Relations Manage	er)	
of United Airlines, and Sara Fields, Vice	)	
President, and Paul MacKinnon,	)	
individually and as International Treasurer	)	
of Association of Flight Attendants, Shirley	)	
Barber as International Treasurer of United	)	C.A. No. 04-10366 JLT
Airlines Master Executive Council of the	)	
Association of Flight Attendants, Maria	)	
Torre individually and as Association of	)	
Flight Attendants Chairman of Grievance	)	
Committee, Pat Friend, individually and	)	
as President of Association of Flight	)	
Attendants,	)	
Defendants.	)	
	_)	

## MOTION TO EXTEND TIME TO FILE OPPOSITION TO MENEZES' MOTION TO REOPEN CASE

Defendants United Airlines, Frank Colosi and Sara Fields (collectively "Defendants") hereby move this Court to extend their time for opposing Plaintiff's Motion to Reopen Case from January 23, 2006 to February 2, 2006. In support of their motion, Defendants state as follows:

- 1. In or about November 2004, Plaintiff Harriet Menezes ("Menezes") and Defendants executed a Confidential Settlement Agreement, Release and Waiver ("Settlement Agreement") and Stipulation of Dismissal in this litigation dismissing with prejudice all of Menezes' claims.
- 2. On January 13, 2006, Menezes filed her Motion to Reopen Case alleging, among other things, that she was induced into signing the Settlement Agreement by

fraudulent and misleading representations made by opposing counsel during settlement negotiations. An opposition to Menezes' motion is currently due by January 23, 2006.

3. Brigitte M. Duffy, lead counsel for Defendants, is on trial during the week of January 16, 2006 and Defendants require additional time to adequately respond to and oppose Menezes' motion.

WHEREFORE, Defendants respectfully request this Court allow this motion for a ten (10) day extension of time to February 2, 2006 in which to oppose Menezes' motion.

Respectfully submitted,

UNITED AIRLINES INC., FRANK COLOSI AND SARA FIELDS

By their attorneys,

/s/ Yvette Politis

Brigitte M. Duffy (BBO # 565724) Yvette Politis (BBO # 644986) SEYFARTH SHAW LLP World Trade Center East Two Seaport Lane, Suite 300 Boston, MA 02110 (617) 946-4800

January 18, 2006

## **Certificate of Compliance with Local Rule 7.1**

I, Yvette Politis, hereby certify that on January 17, 2006, I conferred with Menezes in an effort to narrow the issues in dispute before filing this motion with this Court by requesting that she assent to this extension of time. Plaintiff advised me that she would not agree to the requested extension. On January 18, 2006, I also conferred with Mary Sullivan, counsel for the Union defendants, who agreed to the extension.

/s/ Yvette Politis
Yvette Politis

## **Certificate of Service**

I, Yvette Politis, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 18, 2006.

/s/ Yvette Politis
Yvette Politis